

PERKINScoie

1155 Avenue of the Americas
22nd Floor
New York, NY 10036-2711

+1.212.262.6900
+1.212.977.1649
PerkinsCoie.com

November 29, 2022

Keith W. Miller
KeithMiller@perkinscoie.com
D. +1.212.262.6906
F. +1.212.977.1641

VIA ECF

Hon. Peter Barbadoro
United States District Court
District of New Hampshire
55 Pleasant Street
Concord, NH 03301

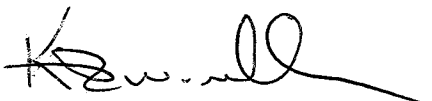
Re: SEC v. LBRY, Inc., No. 1:21-cv-00260 (PB) (D.N.H.)

Dear Judge Barbadoro:

We write on behalf of LBRY, Inc. ("LBRY") to provide a status report to the Court with respect to the parties' settlement negotiations in the above-referenced matter, as requested by Your Honor during the November 21, 2022 status conference.

LBRY provided the SEC with a settlement proposal on Friday, November 25, which was consistent with the framework laid out by Your Honor during last week's status conference. The parties discussed LBRY's settlement proposal today via a video conference and were unable to reach a resolution with respect to the remedies sought by the SEC. Accordingly, LBRY respectfully requests that the Court order an expedited briefing schedule concerning the remedies sought by the SEC in this litigation.

Respectfully submitted,



Keith W. Miller

Cc: All counsel of record (via email)